

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR  
PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*,

Debtors<sup>1</sup>

PROMESA  
Title III

No. 17-BK-3283-LTS

**RESERVATION OF RIGHTS OF VAQUERIA TRES MONJITAS, INC. WITH  
RESPECT TO THE SEVENTH AMENDED TITLE III JOINT PLAN  
OF ADJUSTMENT OF THE COMMONWEALTH OF PUERTO RICO, ET AL.,**

COMES NOW, Vaquería Tres Monjitas, Inc. (“VTM”), through its undersigned counsel, files this reservation of rights with respect to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, *et al.* [ECF. No. 17627] (the “Plan”), and respectfully states as follows:

1. Since the filing of the Plan, the Oversight Board and VTM have engaged in good faith negotiations regarding, among other things, (a) allowance of VTM’s Dairy Producer Claim (as defined in the Plan), (b) treatment of the VTM Dairy Producer Claim under the Plan, and (c) clarification that the Plan and proposed Confirmation Order will not affect or diminish the terms and conditions of the Dairy Producer Settlement (as defined in the Plan) other than the Commonwealth’s obligation to pay certain amounts pursuant to paragraph 14 of the Dairy Producer Settlement.

2. Counsel to the Oversight Board extended through October 21, 2021, VTM’s time to object or otherwise respond to the Plan.

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17- BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

3. VTM believes that the parties have reached a meeting of the minds, including proposed verbiage to be added to the Plan and proposed Confirmation Order that has been approved by the Oversight Board, AAFAF and the Department of Agriculture.

4. While VTM is in the process of confirming the negotiated resolution with counsel to the Oversight Board, it files this Reservation of Rights out of an abundance of caution. If the Plan is not amended to include the provisions the parties discussed, or the Plan is not confirmed, VTM reserves the right to object to the Plan (as such Plan may be further amended) on non-dischargeability grounds or any other applicable grounds.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 21st day of October 2021.

**WE HEREBY CERTIFY** that on this same date the foregoing Reservation of Rights was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

**G. CARLO-ALTIERI LAW OFFICES, EPSTEIN BECKER & GREEN, P.C.  
LLC**

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